

## COMMENT SET 10: CITIZENS FOR GOLETA VALLEY

(09/15/2006) Peter Strait - CGV EMT 060915.doc

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*Citizens for Goleta Valley*  
P.O. Box 1564, Goleta, CA 93116-1564

September 15, 2006

To: Peter Strait, Project Manager,  
California State Lands Commission  
From: Diane Conn,  
Boardmember, Citizens for Goleta Valley  
RE: Comments re **Venoco Ellwood Marine Terminal Lease Renewal Project**  
SCH No. 2004071075  
CSLC EIR No. 730  
CSLC File #: W20068.5

Dear Mr. Strait,

Citizens for Goleta Valley is a grass-roots organization that promotes comprehensive planning in order to protect a high quality of life for the Goleta Valley. Our interest in the (EMT) is that active oil projects are using the Best Available Technology (BAT), in order to reduce the impacts of oil extraction, processing and transport.

When the Jovalon loads up at Sands Beach for 4 days, every 10 days or so, it maintains a noisy, smelly presence. This is disheartening because the beach experience is envisioned as a relief from urban noise and pollution. In addition, this area has been the focus for rehabilitation of the Snowy Plover Habitat, that is threatened by oil activities. As a resident of Isla Vista and a former Snowy Plover docent, I experience the impacts of the barge on a regular basis. While for some Platform Holly is a pretty picture, or "crystal ship", for me it is a constant reminder of the everyday pollution and possibility of an accident. It is within this context I offer the following comments for CGV.

I appreciate many of the mitigations that have been suggested, and concur with the conclusion that the Environmentally Superior Alternative is pipelining the oil.

CGV-1

One of the basic precepts of CEQA is to include all the project components, so that it can be fully analyzed. As we look at the pending projects at Ellwood by Venoco, we see this project, resurrection of 421 and expansion of drilling off Holly. All these projects utilize the Ellwood Oil Facility (EOF), and the EMT. This process would be better served if all three projects were analyzed together. I realize this presents a complex project, however if we are really to uphold CEQA and its prohibition against bi or tri furcation, and the need for comprehensive analysis of cumulative impacts, these projects should be combined.

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CGV-2 Under the proposed project the barge Jovalan could be present at the EMT approximately seven times per month. This will create noise and aesthetic impacts. Since the barge usually takes 4 days to load, at 7 times per month, it will hardly have time to deliver its load. The EIR is inadequate because no mitigations have been offered.

CGV-3 Since Holly is producing less, not more oil, I don't understand the increase in loading trips. Is the rationale for this increase substantiated fully?

CGV-4 When the barge is there, there is a constant noise from the barge engines or the tow, that creates not only noise and aesthetic impacts, but also air quality impacts. At 4 trips per month, every week we'd have to experience barge impacts. That is not acceptable.

1. The operators should find a way to shut off the engines, or the trips should be limited to 2 per month. That would not increase the current impacts of this project.
2. Even if the engines are off, the trips should be limited to 4 per month because of aesthetic impacts: This beach is widely used by the surrounding communities, and for some, one of the main places we can find relief from the urban environment.

Thank you for your work on this project.

Respectfully submitted,

Diane Conn

**RESPONSE TO COMMENT SET 10: CITIZENS FOR GOLETA VALLEY**

- 1 CGV-1 Combining the environmental evaluation of the EMT, PRC 421 and the  
2 Full Field Development project was considered, but based on the timing  
3 of the three projects, as well as the need to reach a decision on the  
4 EMT lease renewal, the CSLC made the decision to move forward on  
5 the EMT DEIR. The EMT DEIR did evaluate potential impacts  
6 associated with increased production from PRC 421, but since crude oil  
7 from the Full Field Development Project could not be transported via  
8 the EMT due to the requirements of AB16, additional crude oil  
9 production from this project was not considered. The No Project  
10 Alternative analysis also evaluated a component of Venoco's Full Field  
11 Development Project, specifically the proposed pipeline to Las Flores  
12 Canyon. Please also see response to Comment VEN-1.
- 13 CGV-2 The DEIR evaluated the maximum permitted oil throughput and barge  
14 loadings that would be allowed under the EMT permit from the  
15 SBCAPCD. However, it is highly unlikely that the barge would make the  
16 maximum number of trips to the EMT. The barge takes 13 to 17 hours  
17 to load, with a complete round trip taking approximately 4 days. The  
18 DEIR identified a wide variety of mitigation measures to reduce  
19 potential impacts associated with the EMT lease renewal. Please refer  
20 to Table ES-1 for a summary of project-related impacts and mitigation  
21 measures particularly as they apply to noise and aesthetics.
- 22 CGV-3 Please see the response to comment SBC-1 on page 3-36. Baseline  
23 conditions are based on the average number of loading trips, while the  
24 analysis of the project, i.e., lease renewal, considered the maximum  
25 number of loading trips allowed under the SBCAPCD permit even  
26 though it is highly unlikely that the permit levels would ever be reached.
- 27 CGV-4 Noise is evaluated on a daily levels basis (Community Noise Equivalent  
28 Level = CNEL). With the proposed Project, the barge would not  
29 increase its daily presence at the mooring area or in the project area.  
30 Only the number of trips per year could increase in the worse case  
31 scenario. Therefore, as per the SBC Thresholds, the noise from the  
32 project will not have a significant impact because the daily noise levels  
33 will not change with the proposed Project. This is discussed in Impact  
34 N-1.

1 Air quality impacts from the project are discussed in Section 4.3.4. The  
2 proposed mitigation measure (AQ-1a and b) limit the number of barge  
3 trips, and regulate shut off of the tug and assist boats engines, thereby  
4 reducing worst case emissions to below the approved threshold. This is  
5 discussed under impact AQ-1, in Section 4.3.4.

6 Aesthetic impacts from the increased presence of the barge are  
7 discussed under impact VR-1, Section 4.11.5. These impacts are  
8 classified as significant unavoidable impacts, and no mitigation is  
9 available to reduce these aesthetic impacts.